

1 JAMES R. OLSON, ESQ.  
Nevada Bar No. 000116  
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Nevada Bar No. 006270  
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4 9950 West Cheyenne Avenue  
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Facsimile: (702) 383-0701

7 Attorneys for Defendants  
8 NOBU HOSPITALITY GROUP, LLC

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 WILLIAM MCKNIGHT, individually,  
12 ELLA MCKNIGHT, individually,

Plaintiff,

13 v.

14 NOBU HOSPITALITY GROUP LLC., a  
15 Foreign Corporation, DOES I - X; and  
ROE CORPORATIONS I - X, inclusive,

16 Defendants.

CASE NO. 2:16-cv-2643

17  
18 **PETITION FOR REMOVAL OF CIVIL ACTION**

19 COME NOW, Petitioner, NOBU HOSPITALITY GROUP, LLC, by and through their  
20 counsel of record, JAMES R. OLSON, ESQ. and THOMAS D. DILLARD, JR., ESQ., of the law  
21 firm of OLSON, CANNON, GORMLEY, ANGULO & STOBERSKI and hereby submit and  
22 respectfully show:

- 23 1. NOBU HOSPITALITY GROUP, LLC is a Defendant in the above entitled action.
- 24 2. The above entitled action was commenced by Plaintiffs WILLIAM MCKNIGHT and  
25 ELLA MCKNIGHT on June 2, 2016 in the Eighth Judicial District Court for the State of Nevada,  
26 in and for the County of Clark, and is now pending in that court. Copies of the Complaint,  
27 Summons and Petition for Exemption from Arbitration pertaining to NOBU HOSPITALITY  
28

1 GROUP, LLC are attached hereto as Exhibits "A", "B" and "C", respectively. Process was served  
 2 upon Petitioner through a process server on or about September 16, 2016. The Plaintiffs filed a  
 3 Petition for Exemption from Arbitration on October 28, 2016, this is the "first paper" received by  
 4 Petitioner from which removability may be ascertained.

5 3. This Petition is filed timely pursuant to 28 U.S.C. §1446(2)(C)(3).

6 4. This action is a civil action over which this Court has jurisdiction pursuant to 28  
 7 U.S.C. § 1332(a), and is one which may be removed to this Court by Petitioner, pursuant to 28  
 8 U.S.C. § 1441(a).

9 5. Petitioner is informed, believes and thereon alleges, that Plaintiffs WILLIAM  
 10 MCKNIGHT and ELLA MCKNIGHT, as individuals, are and were at the time this action  
 11 commenced, citizens of the State of Nevada.

12 6. Petitioner NOBU HOSPITALITY GROUP, LLC is, and was at the time this action  
 13 commenced, a Delaware Corporation, with their headquarters in New York, New York, therefore a  
 14 corporation of the State of New York.

15 7. The above-entitled action is for personal damages Plaintiffs allegedly incurred from  
 16 a slip and fall incident inside a hotel room in the Nobu tower inside Caesars Palace Hotel and  
 17 Casino in Las Vegas, Nevada.

18 7. A copy of Petitioner's Petition for Removal of Civil Action, seeking removal of this  
 19 action to the United States District Court, District of Nevada, together with copies of the  
 20 Complaint, Summons and Petition for Exemption from Arbitration have been deposited with the  
 21 Deputy Clerk in the County Clerk's Office for the Eighth Judicial District Court in and for Clark  
 22 County, Nevada.

23 8. Copies of all pleadings and papers served upon Petitioner in the above entitled action  
 24 are filed herewith.

25 9. This Petition for Removal is filed with the Court within thirty (30) days after  
 26 Petitioner's receipt of the Petition for Exemption, the "first paper" from which the amount in  
 27 controversy may be ascertained in this action. *See* 28 U.S.C. §1446(2)(C)(3). Plaintiff WILLIAM  
 28 MCKNIGHT seeks compensatory and punitive damages for "a traumatic brain injury and severe



1 permanent injuries". (Ex. "C" pg. 2 lines 14-15).

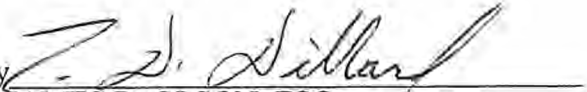
2 In this case, Plaintiffs' cumulative claims for damages meet the requisite amount in  
3 controversy, including a claim that the medical specials in the case for Mr. McKnight now total  
4 \$77,122.42. In light of Plaintiffs' claims for negligence and requests for past and future damages,  
5 the case has a value in excess of the diversity jurisdictional amount.

6 10. These cumulative claims for damages therefore meet the requisite amount in  
7 controversy under 28 U.S.C. § 1441(b).

8 WHEREFORE, Petitioner prays that the above entitled action be removed from the Eighth  
9 Judicial District Court in and for Clark County, Nevada, to this Court.

10 DATED this 16 day of November, 2016.

11 OLSON, CANNON, GORMLEY  
12 ANGULO & STOBERSKI

13  
14 By 

15 JAMES R. OLSON, ESQ.

16 Nevada Bar No. 000116

17 THOMAS D. DILLARD, JR., ESQ.

18 Nevada Bar No. 006270

19 9950 West Cheyenne Avenue

20 Las Vegas, Nevada 89129

21 Attorneys for Defendant

22 **NOBU HOSPITALITY GROUP, LLC**

23  
24  
25  
26  
27  
28  
Law Offices of  
OLSON, CANNON, GORMLEY, ANGULO & STOBERSKI  
A Professional Corporation  
9950 West Cheyenne Avenue  
Las Vegas, Nevada 89129  
(702) 384-4012 Telecopier (702) 383-0701

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 16 day of November, 2016, I served the above  
**PETITION FOR REMOVAL OF CIVIL ACTION** through the CM/ECF system of the United  
States District Court for the District of Nevada (or, if necessary, by U.S. Mail, first class, postage  
pre-paid), upon the following:

Anthony M. Paglia, Esq.  
Dean M. Tanenbaum, Esq.  
Anthony Paglia Injury Lawyer  
255 East Warm Springs Road, #100A  
Las Vegas, NV 89119  
P: 702-830-7070  
F: 702-522-0504  
[apaglia@anthonypaglia.com](mailto:apaglia@anthonypaglia.com)

Yianna C. Reizakis, Esq.  
LEGAL ANGEL  
330 E. Warm Springs Rd.  
Las Vegas, Nevada 89119  
P: 702-315-4287  
F: 702-778-3480  
[mail@legalangel.com](mailto:mail@legalangel.com)

Attorneys for Plaintiffs



An employee of OLSON, CANNON, GORMLEY,  
ANGULO & STOBERSKI

Law Offices of  
OLSON, CANNON, GORMLEY, ANGULO & STOBERSKI  
A Professional Corporation  
9950 West Cheyenne Avenue  
Las Vegas, Nevada 89129  
(702) 384-4012 Telecopier (702) 383-0701

# EXHIBIT A

*Alfred H. Lawrence*  
CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

WILLIAM MCKNIGHT, individually,  
ELLA MCKNIGHT, individually.

CASE NO. A-16-737786-C  
DEPT. NO. XXVI

Plaintiffs,

vs.

### COMPLAINT

NOBU HOSPITALITY GROUP LLC, a Foreign Corporation a Foreign Corporation; DOES I - X; and ROE CORPORATIONS I - X, inclusive,

Defendants.

Plaintiffs, WILLIAM MCKNIGHT and ELLA MCKNIGHT by and through their attorney of record herein Anthony Paglia Esquire of the law firm of Anthony Paglia Injury Lawyer LTD complain and allege against Defendant NOBU HOSPITALITY GROUP LLC ("Defendants") as follows:

## JURISDICTION

1. At all relevant times herein, Defendants were and are doing business in Clark County, Nevada.

2. The actions complained of herein took place in Clark County, Nevada.



1       3. The true names and capacities of the Defendants designated herein as Doc or Roe  
2       Corporations are presently unknown to Plaintiffs at this time, who therefore sues said Defendants  
3       by such fictitious names. When the true names and capacities of these Defendants are ascertained,  
4       Plaintiffs will amend this Complaint accordingly.

5  
6       4. At all times pertinent herein, Defendants were agents, servants, employees or joint  
7       venturers of every other Defendant, and at all times mentioned herein were acting within the scope  
8       and course of said agency, employment, or joint venture, with knowledge and permission and  
9       consent of all other named Defendants.

10  
11       5. All Defendants are jointly and severally liable.

12                   BACKGROUND INFORMATION

13  
14       6. Plaintiffs incorporate the foregoing paragraphs of the Complaint as though said paragraphs  
15       were fully set forth herein.

16  
17       7. On or about August 29, 2014, William McKnight and Ella McKnight were hotel guests at  
18       Nobu Hotel at Caesars Palace located at 3570 Las Vegas Boulevard South, Las Vegas Nevada  
19       89109, Room 8116.

20       8. William McKnight slipped and fell inside his hotel bathroom.

21       9. William McKnight struck his head and suffered traumatic brain injury.

22       10. Ella McKnight discovered her husband William McKnight lying unconscious on the floor  
23       of the bathroom.

24  
25  
26       ///

27       ///

FIRST CAUSE OF ACTION  
(Negligence)

11. Plaintiffs incorporate the foregoing paragraphs of the Complaint as though said paragraphs were fully set forth herein.

12. Defendants owed Plaintiffs a duty of care.

13. Defendants breached that duty of care.

14. Manager Adam Calig visited the bathroom on August 31, 2014, and opined that moisture on bathroom floor might be due to a structural defect.

15. As a direct and proximate result of the negligence of Defendants, Plaintiffs have been damaged in an amount in excess of \$10,000.00.

SECOND CAUSE OF ACTION  
(Negligent Hiring, Training, Retention, and Supervision)

16. Plaintiffs incorporate the foregoing paragraphs of the Complaint as though said paragraphs were fully set forth herein.

17. Defendants had a duty of reasonable care to protect Plaintiffs from negligent and/or careless actions of its own agents, officers, employees, and others.

18. Defendants had a duty not to franchise or hire individuals with the propensity toward committing unlawful and/or harmful acts against Plaintiffs.

19. Defendants had a duty to adequately train and supervise its employees in regard to all correct policies, procedures, and lawful activities within the workplace.

///

///

///



1       20. Defendants breached these duties and damaged Plaintiffs by failing to supervise, train,  
2       hire, and appoint appropriate personnel, which resulted in emotional distress and bodily injury to  
3       Plaintiffs.  
4

5       21. As a direct and proximate cause of Defendants' conduct described herein above Plaintiffs  
6       were damaged in an amount in excess of \$10,000.00.  
7

8       22. Plaintiffs, as a result of Defendants' negligent hiring, training, retention, and supervision,  
9       retained an attorney in the State of Nevada to prosecute its claims for relief herein and, as such, is  
10      entitled to its reasonable attorney's fees and costs associated with prosecution of the same.  
11

12      23. Defendants acted willfully and maliciously, and with oppression, fraud, or malice, and as a  
13      result of Defendant's negligent hiring, training, retention, and supervision, Plaintiffs are entitled to  
14      an award of exemplary or punitive damages.  
15

16                   THIRD CAUSE OF ACTION  
                  (Respondent Superior)

17      24. Plaintiffs incorporate the foregoing paragraphs of the Complaint as if those paragraphs  
18      were fully incorporated herein.  
19

20      25. Defendant Doe I-X was acting within the course and scope of employment while working  
21      at the business.  
22

23      26. Defendants are therefore liable for the negligent actions of Doe I-X.  
24

25      27. Plaintiffs were injured as a proximate consequence of Doe I-X's actions.  
26

27      28. As a direct and proximate cause of Doe I-X's negligence, Plaintiffs have been damaged in  
28      an amount in excess of \$10,000.00.

///

1 29. Plaintiffs, as a result of Doe I-X's actions as set forth herein, retained an attorney in the  
2 State of Nevada to prosecute its claims for relief herein and, as such, is entitled to its reasonable  
3 attorney's fees and costs associated with prosecution of the same.  
4

5 **FOURTH CAUSE OF ACTION**  
6 **(Loss of Consortium)**

7 30. Plaintiffs incorporate the foregoing paragraphs of the Complaint as though said  
8 paragraphs were fully set forth herein.  
9

10 31. Plaintiffs William and Ella McKnight are married. They have been married over forty-  
11 five years, which includes the date of the subject incident August 29, 2016.

12 32. That as a result of the wrongful and negligent acts of the Defendants, and each of them,  
13 the Plaintiffs were caused to suffer, and will continue to suffer in the future, loss of consortium,  
14 loss of society, affection, assistance, and conjugal fellowship, all to the detriment of their marital  
15 relationship.  
16

17 33. That all the aforesaid injuries and damages were caused solely and proximately by the  
18 negligence of the Defendants.  
19

20 WHEREFORE, Plaintiffs pray for a judgment against all Defendants, and each of them, as  
21 follows:  
22

- 23 1. For general and compensatory damages against Defendants individually, jointly and  
24 severally in an amount in excess of \$10,000.00;
- 25 2. For general damages in an amount in excess of \$10,000.00;
- 26 3. For special damages in an amount in excess of \$10,000.00;
- 27 4. For punitive damages in an amount in excess of \$10,000.00;
- 28

5. For attorney's fees and costs;
6. For interest at the statutory rate; and
7. For such other relief as the Court deems just and proper.

ANTHONY PAGLIA INJURY LAWYER

By: 

Anthony M. Paglia, Esq.  
Nevada Bar No. 11234  
Dean M. Tanenbaum, Esq.  
Nevada Bar No. 13263  
ANTHONY PAGLIA INJURY LAWYER LTD  
255 E. Warm Springs Road Suite 100A  
Las Vegas, NV 89119  
*Attorneys for Plaintiffs*  
WILLIAM McKNIGHT and  
ELLA McKNIGHT



## EXHIBIT B

Electronically Filed  
10/04/2016 09:50:35 AM



CLERK OF THE COURT

**SUMM**

Anthony M. Paglia, Esq.  
Nevada Bar No. 11234  
Dean M. Tanenbaum, Esq.  
Nevada Bar No. 13263  
ANTHONY PAGLIA INJURY LAWYER LTD  
255 E. Warm Springs Road Suite 100A  
Las Vegas, Nevada 89119  
Telephone: (702) 830-7070  
Facsimile: (702) 522-0504  
E-mail: apaglia@anthonypaglia.com  
Attorney for Plaintiffs  
WILLIAM MCKNIGHT and  
ELLA MCKNIGHT

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08/08/2016 01:04:13 PM



CLERK OF THE COURT

DISTRICT COURT

CLARK COUNTY, NEVADA

WILLIAM MCKNIGHT, individually,  
ELLA MCKNIGHT, individually.

Plaintiffs,

vs.

NOBU HOSPITALITY GROUP LLC., a  
Foreign Corporation a Foreign Corporation;  
DOES I - X;  
and ROE CORPORATIONS I - X, inclusive,

Defendants.

CASE NO. A-16-737786-6  
DEPT. NO. XXVI

**SUMMONS**

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU  
WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ  
THE INFORMATION BELOW.**

TO THE DEFENDANT: Nobu Hospitality Group, llc,

A civil Complaint has been filed by the plaintiff against you for relief set forth in the  
Complaint.

1. If you intend to defend this lawsuit, within 20 days after this Summons is served  
on you exclusive of the day of service, you must do the following:

a. File with the Clerk of this Court, whose address is shown below, a formal written  
response to the Complaint in accordance with the rules of the Court.

b. Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the plaintiff and this Court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.

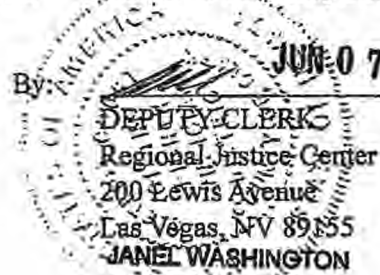
3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

Issued at direction of:

ANTHONY PAGLIA INJURY LAWYER LTD

Steven D. Grierson, CLERK OF COURT

Anthony M. Paglia, Esq.  
Nevada Bar No. 11234  
255 E. Warm Springs Suite 100  
Las Vegas, Nevada 89119  
*Attorney for Plaintiffs*  
WILLIAM MCKNIGHT and  
ELLA MCKNIGHT



JUN 07 2016

DATE



**Affidavit of Process Server**

District Court, Clark County Nevada

(NAME OF COURT)

William McKnight, Ella McKnight

vs NOBU Hospitality Group LLC

A-16-737786-C

PLAINTIFF/PETITIONER

DEFENDANT/RESPONDENT

CASE NUMBER

I, Jason V. Kuczeriawenko, being first duly sworn, depose and say: that I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to perform said service.

Service: I served NOBU Hospitality Group LLC

NAME OF PERSON / ENTITY BEING SERVED

with (list documents) Summons and Complaintby leaving with Michael Miller-McCreanor

Registered Agent's Authorized employee At

NAME

RELATIONSHIP

☐ Residence

ADDRESS

CITY / STATE

☒ Business 2140 Dupont Hwy.,

Camden, DE 19934

ADDRESS

CITY / STATE

On 09/16/2016

AT

3:06 pm

DATE

TIME

☐ Inquired if subject was a member of the U.S. Military and was informed they are not.

Thereafter copies of the documents were mailed by prepaid, first class mail on

DATE

from

CITY

STATE

ZIP

**Manner of Service:**☐ **Personal:** By personally delivering copies to the person being served.☐ **Substituted at Residence:** By leaving copies at the dwelling house or usual place of abode of the person being served with a member of the household over the age of \_\_\_\_\_ and explaining the general nature of the papers.☐ **Substituted at Business:** By leaving, during office hours, copies at the office of the person/entity being served with the person apparently in charge thereof.☐ **Posting:** By posting copies in a conspicuous manner to the front door of the person/entity being served.

**Non-Service:** After due search, careful inquiry and diligent attempts at the address(es) listed above, I have been unable to effect process upon the person/entity being served because of the following reason(s):

☐ Unknown at Address ☒ Moved, Left no Forwarding ☐ Service Cancelled by Litigant ☐ Unable to Serve in Timely Fashion☐ Address Does Not Exist ☒ Other Registered Agent no longer exist, State Division of Revenue has no forwarding information

Service Attempts: Service was attempted on: (1)

DATE

TIME

(2)

DATE

TIME

(3)

DATE

TIME

(4)

DATE

TIME

(5)

DATE

TIME

Description: Age 28 Sex m Race w Height 5'9" Weight 205 lbs Hair Brown Beard yes Glasses yes

SIGNATURE OF PROCESS SERVER

SUBSCRIBED AND SWORN to before me this 16th day of September, 2016, by Jason V. Kuczeriawenko.  
 Proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

SIGNATURE OF NOTARY PUBLIC

NOTARY PUBLIC for the state of Delaware**MARK C. TRIMBLE**

NOTARY PUBLIC

STATE OF DELAWARE

My Commission Expires August 25, 2018

# EXHIBIT C

ELECTRONICALLY SERVED  
10/28/2016 03:44:19 PM

1 **REQT**

Yianna C. Reizakis

2 Nevada Bar No. 9896

LEGAL ANGEL

3 330 E Warm Springs Road

4 Las Vegas, Nevada 89119

Telephone: (702) 315-4287

5 Facsimile: (702) 778-3480

Email: mail@legalangel.com

6 And

Anthony M. Paglia, Esq.

7 Nevada Bar No.: 11234

8 **ANTHONY PAGLIA INJURY LAWYER**

255 E Warm Springs Road, Suite 100A

9 Las Vegas, NV 89119

Tel: (702) 830-7070

10 Fax: (702) 522-0504

Email: apaglia@anthonypaglia.com

11 Counsel for Plaintiffs

12 **WILLIAM and ELLA McKNIGHT**

13  
14 DISTRICT COURT

15 CLARK COUNTY, NEVADA

16  
17  
18 WILLIAM McKNIGHT, individually; ELLA  
19 McKNIGHT, individually,

20 Plaintiffs,

21 v.

22 NOBU HOSPITALITY GROUP LLC, a Foreign  
Corporation; DOES I through X; and ROE  
23 CORPORATIONS I through X, inclusive,

24 Defendants.

CASE NO. A-16-737786-C  
DEPT NO. XXVI

25 **REQUEST FOR EXEMPTION FROM ARBITRATION**

26 Plaintiffs WILLIAM and ELLA McKNIGHT (hereinafter collectively "Plaintiffs"), by and  
27 through counsel, YIANNA C. REIZAKIS, of LEGAL ANGEL, hereby request that the above entitled  
28



1 matter be exempted from arbitration pursuant to Nevada Arbitration Rules 3 and 5, as this case:

- 2 1. \_\_\_\_\_ presents a significant issue of public policy;
- 3 2. X involves an amount in excess of \$50,000 per Plaintiff,
- 4 exclusive of interest and costs;
- 5 3. \_\_\_\_\_ presents unusual circumstances which constitute good cause
- 6 for removal from the program.

7 This is an action for personal injuries and loss of consortium related to those injuries, both  
 8 resulting from an incident which occurred on or about August 29, 2014, at Nobu Hotel at Caesars  
 9 Palace located at 3570 Las Vegas Boulevard South, Las Vegas Nevada 89109, room 8116.  
 10 Specifically, Plaintiff William McKnight slipped and fell striking his head and knocking him  
 11 unconscious. Plaintiff's allege Defendant is responsible for the incident as Defendant is responsible for  
 12 creating the circumstances causing the fall.

14 Plaintiff William McKnight claims he suffered a traumatic brain injury and severe and  
 15 permanent injuries as diagnosed by his healthcare providers all related to the subject incident. To  
 16 date, Plaintiff, William McKnight has incurred the following medical expenses related to the subject  
 17 incident:

19 MEDICAL PROVIDER	20 TOTAL
21 1. Desert Springs Hospital	\$58,560.03
22 2. Shoubh Neurological Services	\$2,350.00
23 3. Ireland Army Community Hospital	\$1,072.91
24 4. MedixWest Ambulance	\$1,019.54
25 5. Desert Radiologists	\$1,347.08
26 6. Shadow Emergency Physicians	\$2,231.00
27 7. Heart Center of Nevada	\$1,690.00
28 8. Etown Lung Specialists	\$3,623.00
9. RespiCare	\$3,848.48



HEALTH CARE PROVIDER	TOTAL
10. Quest Diagnostics	\$215.58
11. Rosenstein, M.D.	\$430.00
12. Las Vegas	\$370.00
13. Advanced H	\$70.00
14. Hardin Pro	\$95.00
TOTAL PAST MEDICAL DAMAGES	\$77,122.42
15. Future Medical Care	TBD
TOTAL	Will exceed \$100,000 with future medical care and pain and suffering

Plaintiff William McKnight's past medical damages alone exceed \$70,000. Thus, when future medical costs and pain and suffering are added to this amount, Plaintiffs' case undoubtedly involves an amount in excess of \$50,000. Accordingly, and pursuant to NAR 5, an exemption is requested.

I hereby certify pursuant to N.R.C.P. 11 this case to be within the exemption(s) marked above and am aware of the sanctions which may be imposed against any attorney or party who without good cause or justification attempts to remove a case from the arbitration program.

I further certify pursuant to NRS Chapter 239B and NRS 603A.040 that this document and any attachments thereto do not contain personal information including, without limitation, home address/phone number, social security number, driver's license number or identification card number,

1 account number, PIN numbers, credit card number or debit card number, in combination with any  
2 required security code, access code or password that would permit access to the person's financial  
3 account.

4 Dated this 28<sup>th</sup> day of October, 2016.

7 By /s/ Yianna C. Reizakis   
8 Yianna C. Reizakis  
9 Nevada Bar No. 9896  
10 LEGAL ANGEL  
11 330 E Warm Springs Road  
12 Las Vegas, Nevada 89119  
13 Telephone: (702) 315-4287  
14 Facsimile: (702) 778-3480  
15 Email: mail@legalangel.com  
16 And

17 Anthony M. Paglia, Esq.  
18 Nevada Bar No.: 11234  
19 ANTHONY PAGLIA INJURY LAWYER  
20 255 E Warm Springs Road, Suite 100A  
21 Las Vegas, NV 89119  
22 Tel: (702) 830-7070  
23 Fax: (702) 522-0504  
24 Email: apaglia@anthonypaglia.com  
25 Counsel for Plaintiffs  
26 WILLIAM and ELLA McKNIGHT  
27  
28



CERTIFICATE OF SERVICE

I certify that on the 28<sup>th</sup> day of October, 2016, I served a true and correct copy of this document in the above-captioned case in the following manner(s):

    X     by U.S. mail, pursuant to NRCP 5(b)(2)(B), with first-class postage prepaid and addressed as follows:

James R. Olson, Esq.  
Thomas D. Dillard, Jr., Esq.  
OLSON, CANNON, et al.  
9950 West Cheyenne Ave.  
Las Vegas, NV 89129  
Attorneys for Defendant  
NOBU HOSPITALITY GROUP, LLC

Anthony M. Paglia, Esq.  
ANTHONY PAGLIA INJURY LAWYER  
255 E Warm Springs Road, Suite 100A  
Las Vegas, NV 89119  
Attorney for Plaintiffs  
WILLIAM McKNIGHT  
ELLA McKNIGHT

    X     by e-service, pursuant to NEFCR 9(c), EDCR 7.26(a)(4) and EJDC AO 9-12 and AO 14-2, to the following email addresses, which is/are the email addresses registered with the electronic filing system:

calendar@anthonypaglia.com  
aracely@legalangel.com  
mail@legalangel.com  
yreizakis@live.com  
mburgener@ocgas.com  
tdillard@ocgas.com  
charlie@ocgas.com  
wflore@ocgas.com

By   
Employee of LEGAL ANGEL.